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April 5, 2022

**VIA ECF**

Hon. Lorna G. Schofield  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Chan et al. v. Chinese-American Planning Council*  
Case No.: 15-cv-9605 (LGS)

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Dear Judge Schofield:

Along with the TakeRoot Justice and Edward Tuddenham, Esq., we represent Plaintiffs in this matter. We write to request a brief extension from today until Friday, April 8, 2022 to respond to Defendant's letter requesting dismissal of this action. The reason for this request is that we are still discussing next steps with our clients. Defendant has advised that it will not oppose our request provided we do not file a motion, but we cannot commit to that at this time. However, there is certainly no prejudice to Defendant if the Court extends our deadline for 3 days. We therefore respectfully request until April 8, 2022 to respond to Defendant's letter.

Thank you for your attention to the above.


Respectfully Submitted,

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Michael Taubenfeld

Application **GRANTED**. The request is untimely and should have been made at least two business days in advance of the deadline sought to be extended. By **April 8, 2022**, Plaintiffs shall file any response to Dkt. No. 126, not to exceed two pages. (See Dkt. No. 127.) The Clerk of Court is respectfully directed to close the motion at Dkt. No. 128.

Dated: April 6, 2022  
New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE